

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ENRIQUE JAVIER ROJAS AGOSTO

DEBTOR

CASE NO 15-07576 ESL

CHAPTER 13

**DEBTOR'S MOTION IN COMPLIANCE WITH  
ORDER GRANTING UNOPPOSED MOTION  
DOCKET ENTRY NO. 33**

**TO THE HONORABLE COURT:**

**COMES NOW, ENRIQUE JAVIER ROJAS AGOSTO**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 10, 2019 the Chapter 13 Trustee filed a *Trustee's Request Entry of Order*, Docket No. 32, whereby the Trustee requested the Court to enter an Order for the Debtor to tender his tax refunds.
2. On January 02, 2020, the Court entered an *Order Granting Unopposed Motion*, Docket No. 33, whereby the Debtor is ordered to comply, with the Trustee's request for the Debtor to tender his tax refunds for the years 2015 and 2017.
3. The Debtor respectfully informs the Court that on December 17, 2019, the Debtor sent to the Trustee (uploaded to the Trustee's system) a copy of the Debtor's 2015 and 2017 tax returns.
4. That the Debtor's 2015 and 2017 tax returns reflect the following concerning the Debtor's tax refunds:

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---Tax return for 2015 has a tax refund in the sum of \$00.00 (-\$124.00); and

--- Tax return for 2017 has a tax refund in the sum of \$00.00 (-\$640.00).

3. Based on the above stated, the Debtor respectfully requests that this Honorable Court be informed of the foregoing and grant the present motion in compliance with this Court's *Order Granting Unopposed Motion*, Docket No. 33, in the above captioned case.

**WHEREFORE**, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court be informed of the abovementioned and grant the foregoing motion in compliance with this Court's *Order Granting Unopposed Motion*, Docket No. 33, in the above captioned case.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq.; I also certify that a copy of this motion was sent via US Mail to the Debtor Enrique Javier Rojas Agosto, PO Box 8121 Humacao PR 00792.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 14<sup>th</sup> day of January, 2020.

/s/ Roberto Figueroa Carrasquillo

USDC #203614

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